

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DISTRICT OF COLUMBIA

ROY STEWART MOORE and)	
KAYLA MOORE,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 1:18-cv-02082
)	
SACHA NOAM BARON COHEN,)	
SHOWTIME NETWORKS, INC., and)	
CBS CORPORATION,)	
)	
Defendants.)	

RENEWED MOTION TO ADMIT RACHEL F. STROM *PRO HAC VICE*

NOW COMES Lisa B. Zyberman, an attorney admitted to the Bar of this Court and in good standing, and respectfully moves for the admission of Rachel Strom, *pro hac vice*, as counsel for Defendants Sacha Noam Baron Cohen, Showtime Networks Inc., and CBS Corporation in this proceeding. As grounds therefore, Movant states:

1. Ms. Strom is a member in good standing of the Bar of the State of New York and the Commonwealth of Massachusetts. She is also admitted to practice before the Northern, Southern, and Eastern Districts of New York, District of Massachusetts, Northern District of Illinois, and the U.S. Court of Appeals for the Second, Fourth, and Eleventh Circuit.
2. Ms. Strom is not currently and has never previously been the subject of any disciplinary action by any state or federal bar association or administrative agency.
3. Movant is satisfied that Ms. Strom possesses the character and skills required of a member of the Bar of this Court.
4. As set forth further in the declaration of Eric J. Feder annexed to the Motion for Leave to Appear *Pro Hac Vice* of Eric J. Feder (ECF No. 22-1), Ms. Strom was granted

admission *pro hac vice* in this proceeding on November 14, 2018 under Mr. Feder's sponsorship. We have since learned that Mr. Feder's admission to the Bar of the District of Columbia did not include this Court. Accordingly, I am filing this renewed motion for the admission *pro hac vice* of Ms. Strom.

WHEREFORE, Movant requests admission of Rachel F. Strom *pro hac vice* as representative of Defendants Sacha Noam Baron Cohen, Showtime Networks Inc., and CBS Corporation in this proceeding.

Dated this 15th day of March 2019.

Respectfully submitted,

/s/ Lisa B. Zycherman

Lisa B. Zycherman (D.C. Bar No. 495277)
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CERTIFICATE OF SERVICE

I hereby certify that, on the date below, I caused the foregoing RENEWED MOTION TO ADMIT RACHEL F. STROM *PRO HAC VICE*, DECLARATION OF RACHEL F. STROM, and PROPOSED ORDER to be served via ECF on the following persons:

Larry E. Klayman
Klayman Law Group, P.A.
7050 W. Palmetto Park Road, #15-287
Boca Raton, FL 33433
Email: leklayman@gmail.com

Dated: March 15, 2019

/s/ Lisa B. Zycherman

Fourth and Eleventh Circuits.

4. I certify that I have never been disciplined or sanctioned by any bar.

5. As explained in more detail in the Declaration of Eric J. Feder annexed to the Motion for Leave to Appear *Pro Hac Vice* of Eric J. Feder (ECF No. 22-1), I was admitted *pro hac vice* in this Court in connection with the above-captioned case on November 14, 2018. Apart from that, I have not sought *pro hac vice* admission to this Court in the last two years.

6. I do not engage in the practice of law from an office located in the District of Columbia.

7. I am not currently a member of the District of Columbia Bar and I do not have an application for membership pending.

I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct.

EXECUTED this 15th day of March, 2019.



Rachel F. Strom

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PROPOSED ORDER

Upon consideration of Defendants' renewed motion for admission of attorney Rachel F. Strom *pro hac vice*, it is

ORDERED that Defendants' motion is granted and attorney Rachel F. Strom is granted admission *pro hac vice* as counsel for Defendants Sacha Noam Baron Cohen, Showtime Networks Inc., and CBS Corporation in this proceeding.

Dated this ____ day of _____, 2019.

Hon. Thomas F. Hogan
United States District Judge